Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Termination of Order
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☒ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : CHARTER STEEL

Facility Location: 4300 E 49TH St.

City: Cuyahoga Heights **State:** OH

U.S. EPA ID# OHD 004 220 810

Assigned Staff DERRICK SAMARANSKI **Phone:** 312-886-7812

Name	Signature	Date
Author	Derrick Samaranski	10/31/05
~~**Regional Counsel**~~		
Section Chief	Walt Zalewski P.E.	10/31/05
~~**Branch Chief**~~		
~~**Division Director**~~		

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 07 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DE-9J

Tammy S. Bukach
Environmental Engineer
Charter Steel
4300 E 49th Street
Cuyahoga Heights, OH 44125

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Charter Steel
EPA I.D. No.: OHD 004 220 810

Dear Ms. Bukach:

On March 23, 2005 representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (Ohio EPA) inspected the Charter Steel facility located in Cuyahoga Heights, Ohio. In response to violations of Ohio Administrative Code identified during the inspection, we issued a Notice of Violation to you on September 7, 2005. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated October 10, 2005 and October 31, 2005.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Ohio EPA will continue to evaluate your facility in the future.

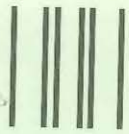
If you have any questions or concerns regarding this matter, please contact Derrick Samaranski at (312) 886-7812.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Gregory Orr, OEPA, NEDO

UNITED STATES POSTAL SERVICE



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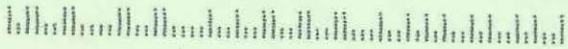
• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Derrick Samaranski DE-9J



SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tammy S. Bukach, Environmental Engineer
Charter Steel
4300 E. 49th Street
Cuyahoga Heights, OH 44125

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* LISA FAIRWEATHER — B. Date of Delivery 11/4/05

C. Signature
X [signature] ☐ Agent ☐ Addressee

D. Is address different from item 1? ☐ Yes
er delivery address below: ☐ No

☐ Certified Mail ☐ Express Mail
☑ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0006 0292 7186

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

Waste, Pesticides and Toxics Division

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Facility Name : CHARTER STEEL

Facility Location: 4300 E. 49TH Street

City: Cuyahoga Heights **State:** OH

U.S. EPA ID# OHD 004 220 810

Assigned Staff DERRICK SAMARANSKI **Phone:** 312-886-7812

Name	Signature	Date
Author	Derrick Samaranski	08/25/05
Regional Counsel	Michael McCleary (w/ concurrence by email)	08/25/05
Section Chief		9-2-05
Branch Chief		
Division Director		

Directions/Request for Clerical Support:

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   - One copy for the assigned staff;
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6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 07 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DE-9J

Mark J. Haase
Environmental Engineer
Charter Steel
4300 E. 49th Street
Cuyahoga Heights, OH 44125

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Charter Steel
EPA I.D. No.: OHD 004 220 810

Dear Mr. Haase:

On March 23, 2005, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Charter Steel (Charter) located in Cuyahoga Heights, Ohio. The purpose of the inspection was to evaluate Charter's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by Charter personnel, review of records, and personal observations made by the inspector at the time of the investigation, U.S. EPA has determined that Charter Steel is in violation of the requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that Charter Steel is in violation of the following requirements:

1. A generator accumulating universal waste lamps in packages or containers must label the packages or the containers with one of the following phrases: "Universal Waste- Lamp(s)", or "Waste Lamp(s)", or "Used Lamps" and keep the packages or containers closed. See, OAC rules 3745-273-14(E) and 3745-273-13(D)(1) [40 CFR §§ 273.14(e) and 273.13(d)(1)]. At the time of the inspection, Charter Steel failed to keep closed and label the packages accumulating the universal waste lamps with one of the following phrases: "Universal Waste- Lamp(s)", or "Waste Lamp(s)", or "Used Lamps". Charter Steel therefore violated the above-referenced generator requirements.

2. A generator of solid waste that is not excluded from regulation or a listed hazardous waste, must determine through either testing or applying process knowledge whether its waste is hazardous. See, OAC rule 3745-52-11(C) [40 CFR § 262.11(c)]. At the time of the inspection,

Charter Steel had not made a determination of whether the waste generated from the sandblasting operations--specifically sand blasting sand and filters– was hazardous or not. Charter Steel therefore violated the above-referenced generator requirement.

3. A generator of used oil must clearly label or mark the containers used for storage of used oil with the words "Used Oil". See, OAC rule 3745-279-22, par. (C)(1) [40 CFR § 279.22(c)(1)]. At the time of the inspection Charter Steel failed to label or mark a 55-gallon drum of used grease with the words "Used Oil". Charter Steel therefore violated the above-referenced generator requirement.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6924(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately and within a specified time period. Although this letter is not such order, you are here requested to submit a response to the violation/violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements.

You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski of my staff at (312) 886-7812.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Gregory Orr, OEPA, NEDO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	Charter Steel EPA I.D. No.: OHD 004 220 810
FACILITY ADDRESS:	4300 E 49th Street Cuyahoga Heights, OH 44125
FACILITY TYPE/ PRIORITY SECTOR:	Rolled Steel Shape Manufacturing Steel Wire Drawing
RCRA DESIGNATION:	LQG
NAICS CODE:	331221, 331222
DATE OF INSPECTION:	March 23, 2005
FACILITY REPRESENTATIVES	Mark J. Haase, Environmental Engineer Michael J. Alderson, Safety Engineer
U.S.EPA INSPECTOR: OHIO INSPECTOR:	Derrick Samaranski, WPTD, ECAB, CS2 Gregory Orr, Environmental Specialist
REPORT PREPARED BY:	Derrick Samaranski, Environmental Engineer
REPORT REVIEWED BY:	Paul Little, Chief Compliance Section 2 WPTD, ECAB

Purpose of Inspection:

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) of the Charter Steel installation for the management of the Resource Conservation and Recovery Act (RCRA) regulated waste.

Facility Description:

Charter Steel installation is located in the Cuyahoga Heights area of Cleveland, OH and was purchased by Charter from American Steel and Wire in February of 2002. American Steel and Wire ceased manufacturing operations at the Cuyahoga Heights location in 2000. The facility occupies an area of 240 acres, employs 89 workers and specializes in hot rolling of steel billets in to steel wire coils for the production of bolts in the automotive industry.

The wire drawing production at the Charter Steel installation consists of heat conditioning of steel billets in the furnace, processing of the heated billets through a series of rolling units that reduce the diameter of the billet, and wire drawing in the spool units that spin the hot steel into coils. After wire drawing, hot steel coils are cooled with water, ends cut, and finished coil products bound and packaged for shipment. Finished bound end products are then directly shipped to the customers or transferred to Charter Steel Fostoria, WI plant for further processing.

Charter Steel installation generates: used oil, grinder coolant, spent solvent, waste water, scale material, filter sand, spent solvent, rags, waste aerosols, sand blasting sand and filters as result of wire drawing operations. The facility uses process knowledge, Material Safety Data Sheets (MSDS), and waste analysis to characterize its waste streams.

In 2002 and 2004 Charter Steel generated and managed hazardous wastes, PCBs and asbestos as a result of cleanout operations and demolition of old buildings. At the time of CEI inspection Charter Steel did not generate or manage hazardous wastes. The last shipment of hazardous waste for off-site disposal from the facility occurred in October of 2004 and the contents of the last shipment are listed in the appendix. Charter filed Annual Hazardous Waste reports covering its hazardous waste management activities in years 2002 and 2004; no hazardous wastes were being generated in 2003. In the future Charter Steel plans to operate a melt shop with an electric arc furnace for processing of scarp steel. The shop is scheduled to begin operations in April of 2006.

Facility Inspection and Observations:

Before visiting Charter Steel facility I met with Greg Orr, who accompanied me during the inspection of the facility. Mr. Orr works as a hazardous waste inspector for the Ohio Environmental Protection Agency (OEPA). We arrived at the guard booth of the facility at 8:00 am local time introduced ourselves to the guard on duty and asked to speak with Stephen R. Messier, the hazardous waste contact person for the facility. After signing in

at the guard booth we were directed to drive to the facility parking lot where we were met by Charter Steel's safety engineer, Michael Alderson. We introduced ourselves to Mr. Alderson, presented our official credentials and explained the purpose of our visit. Mr. Alderson invited us to a meeting room to wait for Mr. Mark Haase, the new contact person for hazardous waste management at Charter Steel. As we waited for Mr. Haase I asked Mr. Alderson to give us a description of the facility's manufacturing process. Mr. Alderson talked about the steel wire manufacturing operations and history of the site including the PCB and asbestos clean-ups, and new construction of the electric arc furnace. With the help of two aerial photos located in the meeting room and facility layout map Mr. Alderson identified manufacturing, PCB clean-out, demolition, and new construction areas. Mr. Haase arrived 20 minutes after our initial meeting with Mr. Alderson and again we introduced ourselves, presented our official credentials, and explained the purpose of our visit to Mr. Haase. Mr. Haase expanded on Mr. Alderson's description of the facility's manufacturing operations, clean out operations and added that at the current time Charter Steel did not generate hazardous wastes and the wastes generated since 2002 resulted from clean out operations and demolition of old buildings. I asked about universal waste and used oil that might be managed by Charter Steel and was told that the facility generates and manages used oil and universal lamps which it recycles through Northland. Mr. Haase explained that we would need to speak with facility personnel in charge of certain areas to find out more about used oil management, spent solvents, and universal wastes. During the facility walkthrough we were joined by Mike Banketstein, a consultant from RMT hired by Charter Steel to assess facility's air emission compliance. The facility walkthrough started at 10:20 am and began with a visit to the maintenance shop.

Maintenance Shop

The maintenance shop operates five parts washers that generate terpene hydrocarbon and petroleum naphtha based spent solvent. The MSDS for the solvent does not list any hazardous waste constituents and gives the flash point of the solvent as 144°F. Charter Steel manages its spent parts washing solvent as a non-hazardous waste material and offers it for disposal through a contractor, Chemical Solvents Inc. In addition to the spent solvents maintenance shop generates shop rags that are used in wiping oil. The rags are recycled through Arrow Uniform and are not considered a hazardous waste stream. Spent aerosol cans from paints and rust inhibitor are also generated in the maintenance shop area. Shop employees puncture the empty cans to release the propellants and dispose of the punctured cans in the trash bin. Mr. Orr from OEPA suggested that Charter Steel look into recycling of the empty aerosol cans and a device for capturing the liquid material that might be inside the cans. At the time of the CEI Charter Steel had been managing the aerosol cans as empty containers that are exempt from hazardous waste regulations. During our visit to the maintenance shop we spoke with Dave Ligh.

Steel Billet Forming Area

Following our visit to the maintenance shop we visited the steel billet forming area. The furnace in this area is used to heat the steel billets so that they are more formidable to

drawing wire in the wire drawing and spinning areas. No hazardous waste issues were identified in the steel billet forming area.

Coil Cooling Area

Next we visited the coil cooling area where the finished spun steel wire is cooled, ends cut, and the coils bound and stored for shipping. The whole process is automated with the overhead cranes moving the steel coils from the spinning area to the cooling area and final processing. No hazardous wastes are being generated in the coil cooling area. On the way to the waste water treatment area in the Down Ender area I observed a 55-gallon drum of waste grease. The drum was not labeled with the words "Used Oil", looked rusted and it was not clear how long the drum was stored in the area.

Waste Water Treatment Area

To treat waste waters Charter Steel operates a closed circuit waste water treatment system whereby cooling water that is being used in the wire drawing process is treated and reused. The waste water treatment consists of a waste water pond, scale pit, two oil tanks, and sand filter tanks. Scale material is continuously scooped out of the waste water pond and deposited into the scale pit. Waste oils are skimmed off the waste water, accumulated in the nearby tanks and offered for off-site disposal to Everclear. After scale removal and waste oil skimming the waste water is filtered through sand filters and returned to the production process. Charter Steel generates approximately 30 tons per month of the scale material and offers it for off-site recycling as steel furnace feed material. Filtering sand is offered for off-site disposal to a local landfill. Both scale material and filtering sand are managed by Charter Steel as non-regulated solid wastes. The latest waste analysis conducted on the scale material was done in 05/11/2000 by Republic Environmental Systems and identified the material as a non-regulated material. Filter sand was last tested on 11/11/2004 by EnvroServe and results indicate that filtering sand is a RCRA non-regulated material.

In addition to the waste water treatment system Charter Steel operates a storm water pond that is permitted under the Ohio Storm Water Discharge permit. The facility takes regular samples of the discharge water and tests for pH, solid content and lead. Charter Steel is currently in the process of renewing its storm water permit.

Used Oil Area

After the visit to the waste water treatment area we visited the facility's used oil management area. The used oil is managed in 4-80 gallon totes and offered for off-site disposal through EverClear. The containers of used oil were closed and labeled.

Roll Shop

In the roll shop Charter Steel generates spent coolant from grinding operations. This material is offered for recycling and is treated as a non-hazardous waste. Greg Orr of

OEPA also asked about the sand blasting sand which the facility uses in the sand blasters. According to shop employee, Bob Dougan, the sand is filtered and disposed off as non-hazardous waste along with sand blasting filters. No analysis on the sand or the filters was conducted to determine whether the sand blasting sand and filters are hazardous substances.

Universal Waste Area

The facility tour ended with a visit to the universal waste lamps accumulation area. The lamps were being stored in the original cardboard containers that were open and missing labels with the words "Universal Waste Lamps". On the way back to the meeting room we observed a wooden crate full of containers with paint materials. At the time of the inspection Charter Steel has not decided whether the paints were wastes or usable product. Mr. Orr and I explained to the facility that when Charter decides to get rid off the paints as wastes they should determine which materials are hazardous and which are not so that proper disposal can take place. Tour ended at this time.

Records Review

For the records review I looked at the last hazardous waste manifest used for the shipment of clean-up waste, an old copy of the contingency plan prepared by American Steel and Wire Company, shipping documents for: used oil, filter sand, scale material, waste lamps, and grinder coolant. I also looked at and obtained copies of: MSDS for the solvent used in the maintenance shop, waste profiles for grinder coolant and used oil, waste analyses for the scale material and filtering sand from the waste water treatment, and a copy of the latest analysis of the storm water. According to Mr. Haase Charter Steel does not maintain records of hazardous waste training because the facility does not generate or manage hazardous waste and the clean-up operations which resulted in generation of hazardous waste were conducted by out-side contractors (Branderburgh Contractor/ Outfitter).

Closing Conference:

During the closing interview I discussed issues that arose as a result of the walkthrough and records review. Issues such as: the management and disposal of the 55-gallon drum of grease in the Down Ender area, management of universal waste lamps, disposal of the paint material, aerosols, and sand and filters from the sand blasting. I also suggested that Charter Steel might have to reevaluate its hazardous waste generation status when the electric arc furnace becomes operational in 2006; currently Charter Steel operates as a non-generator of hazardous waste. Lastly Mr. Orr discussed solid waste recycling opportunities with the facility and the compliance evaluation inspection of Charter Steel ended.

Attachments:

1. Inspection Photo Log.
2. Contents of the last hazardous waste shipment from Charter Steel

Charter Steel
OHD 004 220 810

Date: March 23, 2005

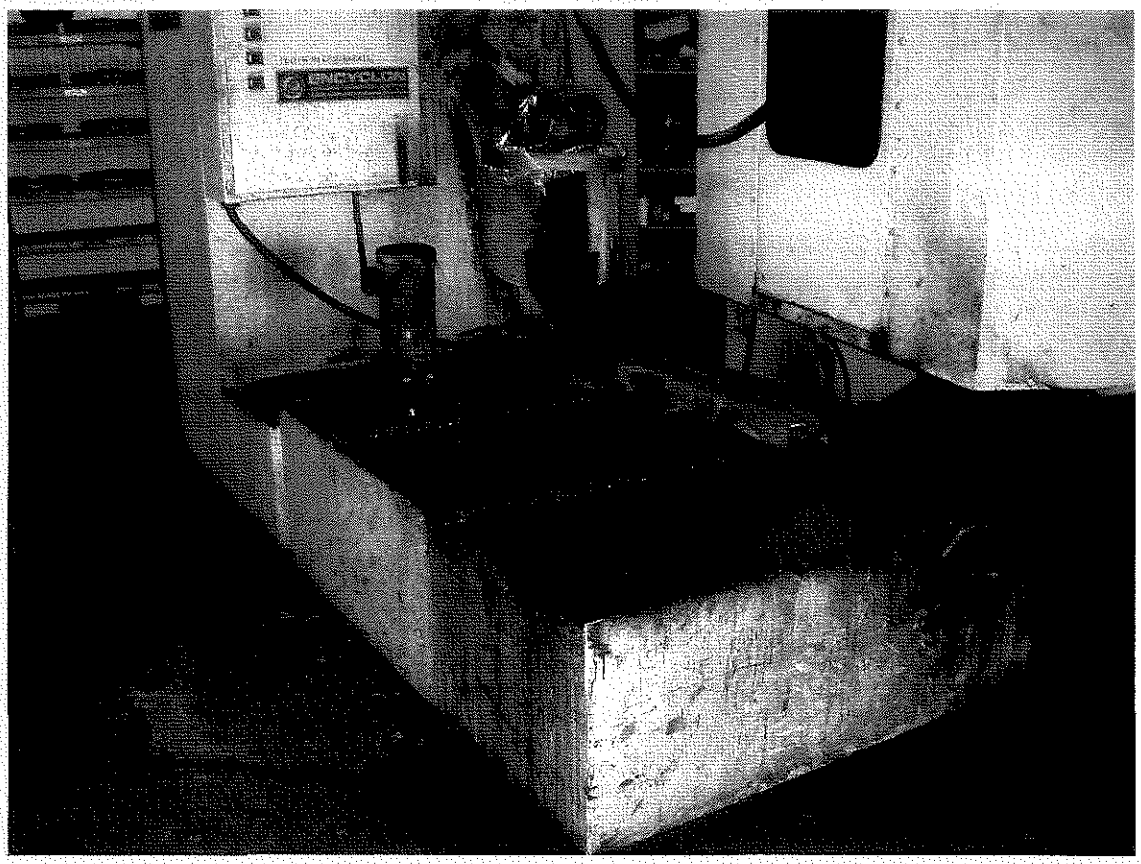
Time: 10:55 AM

Photographed By: Derrick Samaranski

Photograph Number: 1

Comments: 55 gallon drum of used grease in the Down Under area of the steel rolling production line.

Charter Steel
OHD 004 220 810



Date: March 23, 2005

Time: 11:22 AM

Photographed By: Derrick Samaranski

Photograph Number: 2

Comments: Grinder coolant accumulating in the Roll Shop area of the facility.

Content of the last Hazardous Waste Shipment from clean-up operations at Charter Steel

Manifest # 00001	
Substance	**Hazardous Waste Number**
Aerosols	D001
Isopropyl Alcohol	D001, D004
Sodium Hydroxide	D002, D035
Oils, Paints, Coking Sludge	D005, D007
PCB liquids,	U002, D008
Pit Sludge, Grease	Non-regulated
Mercury	D009
Compressed Gas	Non-regulated

Charter Steel
OHD 004 220 810
3/23/05

* At the time of inspection facility operated as a non-generator of HW.

LARGE QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG:< 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? ___Yes ___No ___N/A ___RMK#\

a. If so, what has the company done to minimize waste generation?

- ❑ A change in the process resulting in less waste.
- ❑ A change in the product resulting in less waste.
- ❑ Use of fewer and less toxic hazardous raw materials.
- ❑ Better operations/improved housekeeping.
- ❑ On-site recycling/reuse of hazardous materials.
- ❑ Sending waste off-site for recycling/reuse.
- ❑ Other activities (specify):

b. ***If so,*** what wastes have been addressed?

- ❑ Solvents
- ❑ Paint related wastes
- ❑ Industrial process wastes (sludges, slags, contaminated wastes waters, etc.)
- ❑ Contaminated oils/hydraulic fluids
- ❑ Off-spec chemicals
- ❑ Shop rags
- ❑ Other (specify):
- ❑ Waste water
- ❑ Solid waste (paper, plastic, metal, wood, blasting material)
- ❑ Air emissions
- ❑ Energy use
- ❑ Fluorescent light bulbs
- ❑ Used batteries

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- ❑ Lack of information about practical alternatives.
- ❑ Lack of capital to make process changes.
- ❑ Lack of internal management support.
- ❑ The company does not generate enough waste to consider P2.
- ❑ Other reason given (specify):

2. Does the company plan to do P2 activities in the future? ___Yes ___No ___N/A ___RMK#

3. Would the company be interested in receiving additional information from Ohio EPA about P2? ___Yes ___No ___N/A ___RMK#

4. Did you give the company information about P2 during the inspection? ___Yes ___No ___N/A ___RMK#

5. Would the company like a P2 assessment? ___Yes ___No ___(N/A) ___RMK#

A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)

B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them (Attachment III of the P2 Assessment Procedures Manual at: http://www.epa.state.oh.us/dhwm/pdf/P2AssesmentHWGeneraotrs.pdf).

#1) State inspector evaluated.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ___ No ☒ N/A ___ RMK# 2

2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes X No ❑ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ❑ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A ___ RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A ___ RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A ___ RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A ___ RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A ___ RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

Yes ___ No ❑ (N/A) ___RMK#___

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

REMARKS

#2) Sand and filters from sandblasting not evaluate to determine if hazardous substances.

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes X No___

If the answer is no, show them what the statement says using a signed manifest.

NOTE: While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes X No ☐ N/A ___RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] — Yes ___ No ❑ (N/A) ___RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ___ No ❑ (N/A) ___RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] — Yes X No ❑ N/A ___RMK#___

NOTE: *Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ___ No ❑ N/A X RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ___ No ❑ N/A X RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ___ No ❑ N/A X RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ___ No ❑ N/A X RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes ___ No ❑ N/A X RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes ___ No ❑ N/A X RMK#___

   b. Emergency equipment? Yes ___ No ❑ N/A X RMK#___

   c. Emergency systems? Yes ___ No ❑ N/A X RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ___ No ❑ N/A X RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes ___ No ❑ N/A X RMK#___

c. Communication or alarm system? Yes ___ No ❑ N/A X RMK#___

d. Response procedures for fire/explosions? Yes ___ No ❑ N/A X RMK#___

e. Response to groundwater contamination incidents? Yes ___ No ❑ N/A X RMK#___

f. Shutdown procedures? Yes ___ No ❑ N/A X RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ___ No ❑ N/A X RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ___ No ❑ N/A X RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ___ No ❑ N/A X RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ___ No ❑ N/A X RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ___ No ❑ N/A X RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ___ No ❑ N/A X RMK#___

   b. Arrangements with emergency authorities? [3745-65-37] Yes ___ No ❑ N/A X RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ___ No ❑ N/A X RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ___ No ❑ N/A X RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ___ No ❑ N/A X RMK#___

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ___ No ❑ N/A X RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ___ No ❑ N/A X RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ___ No ❑ N/A X RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ___ No ❑ N/A X RMK#___

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No___ N/A X RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ❑ N/A X RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ❑ N/A X RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ❑ N/A X RMK#___

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes ___ No ☐ N/A X RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes ___ No ☐ N/A X RMK#___

   b. Emergency communication device? — Yes ___ No ☐ N/A X RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes ___ No ☐ N/A X RMK#___

   d. Water of adequate volume/pressure? — Yes ___ No ☐ N/A X RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes ___ No ☐ N/A X RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes ___ No ☐ N/A X RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes ___ No ☐ N/A X RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ___ No ☐ N/A X RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ___ No ☐ N/A X RMK#___

   a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No X N/A ___ RMK#___

2. Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes: — Yes ___ No X N/A ___ RMK#___

NOTE: If yes, they may accumulate F006 waste on-site for up to 180 days; or up to 270 days if they must transport the F006 waste over 200 miles for off-site metals recovery; without an Ohio hazardous waste permit, provided that they meet these special conditions (OAC 3745-52-34(G) and (H)):

a. The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling (see your P2 coordinator for a copy of Federal Register 3/00 for a listing of examples of P2 measures, the facility should be prepared to demonstrate this request); — Yes ___ No ☐ N/A X RMK#___

b. The F006 waste is legitimately recycled through metals recovery. — Yes ___ No ☐ N/A X RMK#___

c. No more than 20,000 kg. of F006 is accumulated on-site at any one time. — Yes ___ No ☐ N/A X RMK#___

d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs. — Yes ___ No ☐ N/A X RMK#___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

3. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? — Yes ___ No ☐ N/A X RMK#___

b. Are under the control of the operator of the process generating the waste? — Yes ___ No ☐ N/A X RMK#___

c. Do not exceed a total of 55 gallons of hazardous waste? — Yes___ No___ N/A X RMK#___

d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ___ No ☐ N/A X RMK#___

e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ___ No ☐ N/A X RMK#___

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.

4. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes___ No___ N/A X RMK#___

a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ___ No ☐ N/A X RMK#___

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ___ No ☐ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

5. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ___ No ☐ N/A X RMK#___

6. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ___ No ☐ N/A X RMK#___

7. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ___ No ☐ N/A X RMK#___

b. In good condition? [3745-66-71] Yes ___ No ☐ N/A X RMK#___

c. Compatible with wastes stored in them? [3745-66-72] Yes ___ No ☐ N/A X RMK#___

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes ___ No ☐ N/A X RMK#___

8. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes ___ No ☐ N/A X RMK#___

a. Are inspections recorded in a log or summary? [3745-66-74] — Yes ___ No ☐ N/A X RMK#___

9. For ignitable and/or reactive hazardous waste(s):

a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes ___ No ☐ N/A X RMK#___

b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes ___ No ☐ N/A X RMK#___

PRE-TRANSPORT REQUIREMENTS

10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes ___ No ☐ N/A X RMK#___

11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes ___ No ☐ N/A X RMK#___

12. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes ___ No ☐ N/A X RMK#___

REMARKS

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Derrick Samaranski DE-9J

C010

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mark J. Haase, Environmental Engineer
Charter Steel
4300 E. 49th Street
Cuyahoga Heights, OH 44125

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 9/15

ature Lisa Lauer ☐ Agent ☐ Addressee

address different from item 1? ☐ Yes
er delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Arti... *(Trans... ...om service label)* 7001 0320 0005 9025 4608

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

JAN 18 1991

5HR-12

Ms. Elaine Price
American Steel & Wire Corporation
4300 East 49th Street
Cuyahoga Heights, Ohio 44125

Re: Return to Compliance
American Steel & Wire
OHD 004 220 810

Dear Ms. Price:

We have received and reviewed your letter of September 20, 1990, regarding our Notice of Violation (NOV) dated August 27, 1990.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our August 27, 1990, NOV.

If you should have any further questions, please contact me at (312) 353-6844.

Sincerely yours,

Ann Budich, Acting Chief
IN/MN/OH Enforcement Program Section

cc: Mike Savage, OEPA
Susan McCauslin,

bcc: Ann Budich, REB
5HR-JCK-\budich\walker\6-8093\ann\elaine.p\January 11, 1991

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
1/14/91	ab 1-14-91	ab 1-14-91	

Ann

American Steel & Wire Corporation

Ms. Sally K. Swanson
Chief
IN/MN/OH Enforcement Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

September 20, 1990

RE: Notice of Violation: OHD 004 220 810

Dear Ms. Swanson,

I am responding to your letter dated August 27, 1990 which I received September 4, 1990 concerning potential violations resulting from an Ohio EPA RCRA inspection on July 31 of 1989.

Your letter pointed out two alleged violations. American Steel & Wire does not admit to any violations, however the following comments are in response to your inquiry.

The first issue concerned the lack of proper notification accompanying off-site shipment of land restricted wastes. Soon after that inspection, American Steel & Wire (AS&W) developed and implemented the use of an appropriate "Land Ban" form. A copy is attached for your review. A copy was also sent to OEPA with a confirmation letter explaining that AS&W had developed a procedure and instructions for use of this form and that we were implementing its use. AS&W the received a letter from Ms. Susan McCauslin of OEPA acknowledging compliance on this issue.

The second item in your note suggests that AS&W is out of compliance for not testing the waste against treatment standards. AS&W defines the waste as hazardous because EPA lists it as a hazardous waste from specific sources (K062) and because it exhibits the characteristic of corrosivity (D002). AS&W also defines this waste as a Land Restricted waste through use of the Land Ban form. AS&W does not treat this waste, and therefore, AS&W does not test this waste to determine if treatment standards have been met. AS&W's interpretation of the rule is that because we do not conduct the treatment, AS&W is not subject to the testing requirements. Rather, the company which treats the waste is responsible for testing against treatment standards prior to land disposal of any resulting solid materials. Legal Counsel concurs with this interpretation.

If you have any questions or if you would like to discuss this topic, please don't hesitate to call. Thank you very much.

Sincerely yours,

Elaine A Price
Manager
Environment, Health & Safety

4300 East 49th Street, Cuyahoga Heights, Ohio 44125, Phone: (216) 883-3800

AUG 27 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elaine Price
American Steel and Wire
4300 East 49th Street
Cuyahoga Heights, Ohio 44125

Re: Notice of Violation
American Steel and Wire
OHD 004 220 810

Dear Ms. Price:

On July 31, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

1. The facility was shipping restricted waste without attendant or complete notifications, as required under 40 CFR Part 268.7. Under Part 268.7(a)(1), generators who manage restricted wastes which exceed treatment standards (reference 40 CFR Part 268, Subpart D - Treatment Standards) are required to provide a notification for each shipment of waste. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard; manifest number; and waste analysis data, where available. The notification must be supplied to the treatment facility as a separate document accompanying the manifest. Please include in your response to this NOV, an example of the notification you will supply with each waste shipment.

2. The facility did not determine if the wastes exceed applicable treatment standards. The concentrations may be determined by testing the waste using the Toxicity Characteristic Leaching Procedure Test (Appendix 1 to Part 268), or by determining if the wastes exceed the treatment standards using knowledge of the wastes. If the latter method is used, all supporting data used to make the determination must be maintained in your files.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documents demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

If you have any questions regarding this correspondence, please contact Ann Budich of my staff at (312) 353-6844.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Susan McCauslin, NEDO

bcc: Sally Swanson, REB

8/10/90

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	ab 8-13-90	SKS 8-14-90	

USS Technical Center
4000 Tech Center Drive
Monroeville, PA 15146
412-825-2067
FAX: 412-825-2494

Anthony A. Spinola
Manager - Hazardous Waste
Environmental Affairs

October 22, 1991

Kristen M. Switzer
Environmental Scientist
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087-1969

Subject: **Response to Notice of Violation**
USX Corporation
Former Cuyahoga Works
EPA ID No. 004 220 810

Dear Ms. Switzer:

The following letter addresses the USX response to violations which were identified in your letter to Thomas Zurawick of USX Realty, on September 16, 1991. The violations you identified, and the USX response are listed as follows:

1. Failure to provide a 24-hour surveillance system or an artificial or natural barrier and a means to control entry at all times as required by OAC 3745-65-14 (B)(2)(a) and (b). The tank farm area is unsafe due to excavation and storage of potentially hazardous materials resulting from excavation activities in the area. Although the area is not easily accessible, another company, Gibraltar Steel, leases a building near the site and access from outside the property is possible. It would be acceptable to enclose the area with a snow fence or similar barrier to limit entry.

USX has enclosed the areas identified above with a fence to minimize the likelihood of unauthorized entry to the site. The construction of this barrier was completed on October 3, 1991.

2. Failure to provide a sign reading "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary as required by OAC 3745-65-14 (C). Again, the area of concern is the tank farm area. Warning signs must be posted in this area to further discourage entry to the site.

USX placed the required signs, as identified in OAC 3745-65-14 (C), on the fence. The signs have been placed to discourage unauthorized entry onto the site.

An additional concern raised during the inspection was with regards to a pile of soil and two 55-gallon drums which were discovered near the pump house and in the tank farm area. In your September 16 letter, you requested that these materials be containerized and then tested to determine their characteristics. In order to comply with the requests of the OEPA, USX proposes to sample and analyze the soil pile in order to determine the proper management of this material. The sampling and analysis of the pile will conform with methods outlined in EPA SW-846. Upon completion of the analytical testing, the soil will be managed in accordance with the requirements of the OEPA. However, prior to completion of the analytical testing, the soil will be managed as a hazardous waste.

The waste pile on-site shall be sampled and analyzed prior to its excavation to determine the proper means of treatment and/or disposal to be utilized. Based upon previous knowledge of the waste, a composite sample of the pile will be collected and analyzed for total chromium and lead and chromium and lead via TCLP. Additional analytical testing may be performed as required by the TSD facility accepting the waste.

The size of the pile has been estimated to be approximately 20 cubic yards. In order to determine the characteristics of the waste/soil present, four subsamples will be collected and composited. The subsamples will be collected from four locations chosen from equal sized sections of the pile. The subsamples will be collected at a minimum depth of six inches below the surface of the wastes. This depth has been chosen to eliminate any concern regarding the characteristics of the surface materials relative to the characteristics of the rest of the waste pile.

The subsamples will be collected manually by a trained field technician using clean sampling equipment (i.e., scoop, shovel). Clean, plastic sample bottles will be used to transport the samples to the laboratory. The samples will be properly preserved, labeled and identified. Chain-of-custody documentation will be maintained throughout the sampling and analytical activity. The analytical methods used to characterize the waste shall be performed in accordance with EPA SW-846 requirements.

One field blank will be collected during the sampling activity to document the effectiveness of the field decontamination of the sampling equipment. The field blank will be collected and preserved in the same manner as the waste sample. No additional QA samples are proposed due to the small size of the sampling plan.

The contents of the two 55-gallon drums will also be analyzed to determine their proper management requirements. The drummed materials will be properly characterized and the analytical results will be forwarded to the OEPA. It is anticipated that based on knowledge of the waste handled at the site, a representative sample of each of the drums will be tested for TCLP lead and chromium and total lead and total chromium. Prior to the completion of the analytical testing, the drummed materials will be managed as a hazardous waste.

If you have any questions regarding the waste sampling plan contained herein, please feel free to contact me at your earliest convenience.

Sincerely,

A. A. Spinola/cg

AAS/cg

cc: Thomas Crepeau, OEPA, Columbus
Lisa Pierard, USEPA
Joe Morbito, USEPA
Paul Vandermeer, OEPA, Columbus
Basil A. Procyk, USX
Thomas A. Zurawick, USR Ambridge
James P. Hannan, Killam

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Steel ... Cuyahoga Hts.

U.S. EPA I.D. No.: OHD 004 220 818

Street: 4300 East 49th Street

City: Cuyahoga Hts. State: OH Zip Code: 44125

Telephone: (216) 883-3800

Operator: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 7/31/89 Time: 9:30-12:00 Weather Conditions: Sunny Hot

	Name	Affiliation	Telephone
Inspectors:	Susan McClauslin	OEPA	(216) 425-9171
Facility Representatives:	Elaine Price		

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	✓		✓	✓
Transporter				
Treater				
Storer				
Disposer				

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

	Gen.	Treat	Store	Disp.	Trans.
	____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

✓	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

APP

	Gen.	Treat	Store	Disp.	Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*	✓				
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

APP

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ✓ NA

If yes, check the appropriate treatability group.

___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
___ Pharmaceutical wastewater containing spent methylene chloride
___ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No ✓ NA

If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

____ Yes ____ No ✓ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement

_____
_____
_____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

✓ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

✓ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)

____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
K062	✓	

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ✓ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ✓ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ✓ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ✓ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ✓ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

✓ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate. Yes.

- Testing

  ____ Yes ✓ No ____ NA

  If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

  ____ Yes ____ No ✓ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

  ____ Yes ✓ No ____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

  ____ Yes ✓ No ____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

  ____ Yes ✓ No ____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

  ____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

____ Yes ✓ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

____ Yes ____ No UNKNOWN

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

____ Yes ✓ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No

Identify off-site treatment or storage facilities: Alchemtron (now ESX); Envirite

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ✓ No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ✓ No

D. Demonstration and Certification -- "Soft Hammer" Wastes N/A

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.3(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

Status 3

Re: U.S. Steel Corporation
Cuyahoga Plant
#02-18-0091 G = TSD

OHD 004 220 810
~~OHD 004 222 030~~

RECEIVED
OHIO EPA
AUG 8 1983
DIV. HAZARDOUS MATERIALS MANAGEMENT

U.S. Steel Corporation
1807 East 28th Street
Lorain, Ohio 44055

August 5, 1983

Attn: Mac S. White

Dear Mr. White:

Thank you for the courtesies Mike Schack and John Garvey extended during my hazardous waste permit inspection on July 7, 1983 at the Cuyahoga Plant. A copy of the inspection report is enclosed for your information. The following violations were noted:

Description of Violation	Regulation
1. No provision made for disposal of contaminated soil resulting from K062 tank overflow.	Ohio Administrative Code (OAC) 3745-65-56-G
2. No written report submitted to the Director about release of hazardous waste to the environment.	OAC 3745-65-56-J

Please provide written documentation within 30 days from receipt of this letter of your efforts to correct these violations.

This letter and a copy of the inspection report will become part of the official record of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will be forwarded to U.S. EPA - Region V.

Please contact me if you have any questions.

Sincerely,

Steve Tuckerman
Environmental Scientist
Division of Hazardous Materials Management

ST:km

Enclosure

cc: ✓Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V

7-7-83 13:00 - 13:45
Date a Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0091

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH D004220810

Facility: U.S. Steel Cuyahoga Address: 4300 E. 49th St City: Cuyahoga Hts

State: Ohio Zip Code: 44125 County: Cuyahoga Telephone: (216) 341-3000

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Mike Schock	Envir. Engineer	(216) 277-2482
2.	John Garvey	Maintenance Engineer	(216) 341-5000
3.			

INSPECTOR(S)

1.	Steve Tuckerman	Ohio EPA	(216) 425-9171
2.		Environmental Scientist	
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80
- ☐ Chemical/Physical/ Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	X			
2. If "yes", is it complete and accurate?	X			
3. Has the facility submitted a Part B?		X		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

1.1 Manufacturer of steel wire & rod & flat strip steel HW activity is generation & storage of K062 prior to use at a POTW. Pb steel dust is permited for storage, but all wastes have been removed & facility does not expect to generate this waste anymore.

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	✓			1.1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)			✓	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			✓	
b) The date that accumulation began is clearly marked on each container.			✓	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓			
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	✓			

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	D: Contingency and Emergency	G: Closure
C: Preparedness and Prevention	E: Manifest/Records/Reporting	H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	✓			
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).			✓	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).			✓	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	✓			
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2).	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	✓			
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	✓			
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)	✓			
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	✓			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.			✓	
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			✓	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	✓			4.0
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))			✓	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	✓			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.		✓		4.0

Subpart E: Manifests/Records/Reporting

	Yes	No	N/A	Remark #

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

a)	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)	✓			
b)	Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c)	The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d)	A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			
e)	The present physical location of each hazardous waste within the facility.	✓			
f)	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)			✓	
g)	Records of any waste analyses and trial tests required to be performed.	✓			
h)	Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).	✓			
i)	Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).	✓			
j)	Records of Closure cost estimates and ~~Post-Closure (DISPOSAL ONLY)~~ cost estimates required under Subpart G.	✓			

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	✓			

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)			✓	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))			✓	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.			✓	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.			✓	

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1).	✓			

	Yes	No	N/A	Remark #
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			✓	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or		✓		
b) A surety bond, or		✓		
c) A closure letter of credit, or		✓		
d) A combination of financial mechanisms.		✓		
NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.	✓			

e) Financial Test

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.	✓			

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

4.0 The Sulfuric spent pickle liquor in Tank #1 of the Tank farm overflowed & ran down the side of the tank. The tank was taken out of service due to potential failure by corrosion of the tank by the spilled acid.

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are ~~equipped with a waste feed cutoff or bypass system as required in Section 265.192(d).~~	✓			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	✓			
4. Weekly inspections are made of all tank construction materials and containment structures (265.194).	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).			✓	

	Yes	No	N/A	Remark #
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.			✓	
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)			✓	
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)	✓			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).	✓			

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)			✓	5.0
b) In good physical condition (265.171)			✓	
c) Compatible with the wastes stored in them (265.172)			✓	
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))			✓	
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))			✓	
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)			✓	
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).			✓	
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)			✓	

5.0 No HW drums in drum storage area

Re: U.S. Steel Corporation - Cuyahoga Plant
02-18-0091

U.S. Steel Corporation
Cuyahoga Plant
1807 East 28th Street
Lorain, Ohio 44055

July 14, 1982

Attn: Mac White

Dear Mr. White:

Please express my thanks to Mike Schack and John Garvey for the courtesies they extended during my hazardous waste permit inspection at the Cuyahoga Works on June 8, 1982. A copy of the inspection report is enclosed for your information. The report indicates that this facility was in general compliance with the applicable hazardous waste regulations OAC 3745-50 through 3745-58 and 40 CFR 260 through 265 for the activity listed in your permit.

Testing needs to be done on the surface impoundment which is part of your wastewater treatment system to determine if the liquids or sludges are characteristic hazardous wastes. The results of those tests should be submitted to this office within sixty (60) days from receipt of this letter. This request is pursuant to 40 CFR 265.220 and OAC 3745-57-01. The exclusion in 40 CFR 265.1 (c)(10) does not apply to surface impoundments as defined in 40 CFR 260.10 and OAC 3745-50-10.

A copy of this letter and the inspection report will be forwarded to U.S. EPA - Region V. Feel free to contact me or Kathy Homer of U.S. EPA at (312) 886-7435.

Sincerely,

Steve Tuckerman

Steve Tuckerman
Environmental Scientist
Division of Hazardous Materials Management

ST:km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Peggy Vince, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA - Region V

OhioEPA

Re: Application Number 81-HW-0091
Cuyahoga County

August 26, 1981

Karl Kummant, Chief Engineer
U.S. Steel Corporation, Cuyahoga
1807 E. 28th Street
Cuyahoga Heights, Ohio 44125

Dear Mr. Kummant:

On July 24, 1981, Charles Grigalauski of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Russell Stilson.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Charles Grigalauski, U.S. EPA, Region V
NEDO

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER
(If Applicable)

OHD 004 220 810
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: U.S. Steel Corp., Cuyahoga Plant

(B) Street: 4300 East 49th Street

(C) City: Cuyahoga Heights (D) State: OH (E) Zip Code: 44125

(F) Phone: 216/341-5000 (G) County: Cuyahoga

(H) Operator: U.S. Steel Corp.

(I) Street: 1807 East 28th Street

(J) City: Lorain (K) State: OH (L) Zip Code 44055

(M) Phone: 216/277-2433 (N) County: Lorain

(O) Owner: U.S. Steel Corp.

(P) Street: 600 Grant Street

(Q) City: Pittsburg (R) State: PA (S) Zip Code: 15230

(T) Phone: 412/433-6012 (U) County:

(V) Date of Inspection: 7-24-81 (W) Time of Inspection (From) 9:15 AM (To) 11:20 AM

(X) Weather Conditions: Partly cloudy, 78° F.

C.T. Grigoleville
7-24-81

7-1-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Russel Stinson	Senior Env. Eng.	216/277-2482
John Garvey	Maintenance Eng	216/341-5000

(Z) Inspection Participants	Agency/Title	Telephone
(Above)		

(AA) Preparer Information

Name	Agency/Title	Telephone
Charles Grigalauski	USEPA	312/353-2473

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

A. Storage and/or Treatment
   - ✓ 1. Containers (I)
   - ✓ 2. Tanks (J)
   - 3. Surface Impoundments (K)
   - 4. Waste Piles (L)

B. Land Treatment (M)

C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

NOTE: If facility is also a generator or transportor of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARDS.
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		N.A.
2. Facility expansion?		X		N.A.
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			On-file
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			X	N.A.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			Gate guard 24 hrs.
2. Artificial or natural barrier around facility?	X			Container storage fenced. And Natural Barrier to south.
3. Controlled entry?	X			
4. Danger sign(s) at entrance?	X			Both areas.
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			Pipe-stop log.
2. Records of operator error?	X			
3. Records of discharges?	X			

*Not Inspected

	Yes	No	NI	Remarks
4. Inspection schedule?	X			H.W. Operator and Inspection log.
5. Safety, emergency equipment?	X			
6. Security devices?	X			
7. Operating and structural devices?	X			
8. Inspection log?	X			
(E) Do personnel training records include:				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?	X			In-plant
4. Records of training?	X			
5. Have facility personnel received required training by 5-19-81?		X		June 15, 1981 completed.
6. Do new personnel receive required training within six months?	X			One additional trained on 7-13-81 as foreman.
(F) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?			X	N.A. non-ignitable
3. Separation and protection from ignition sources?			X	N.A. " "

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

	Yes	No	NI	Remarks
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	X	—	None since 11-19-80

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?	X	—	—	Telephone
2. Telephone or 2-way radios at the scene of operations?	X	—	—	Pickle liquor
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	—	—	Extinguishers

Indicate the volume of water and/or foam available for fire control:

8 connections w/ City of Cleveland H_2O and industrial makeup H_2O from Cuyahoga.

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	—	—	Inspected monthly by security.
2. Is emergency equipment maintained in operable condition?	X	—	—	

(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X	—	—	Phone operable at tank area.
(E) Is there adequate aisle space for unobstructed movement?	X	—	—	Container storage area.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

Does the Contingency Plan contain the following information:	Yes	No	NI	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			On-file.
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			Agreements w/ hospital, fire, police. verbal.
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			In plan
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			In plan
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			Addressed in Contingency Plan.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

		Yes	No	NI	Remarks
(B)	Are copies of the Contingency Plan available at site and local emergency organizations?	X			To be sent by John Garvey.
(C)	Emergency Coordinator				
	1. Is the facility Emergency Coordinator identified?	X			Primary and 5 alternates.
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D)	Emergency Procedures				
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	N.A.

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

		Yes	No	NI	Remarks
(A)	Use of Manifest System				
	1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	X			Hand-log procedure in Lorain for tracking.
	2. Are records of past shipments retained for 3 years?	X			Starting Nov. 19, 1980.
(B)	Does the owner or operator meet requirements regarding manifest discrepancies?	X			No discrepancies noted.

(C) Operating Record

	Yes	No	NI	Remarks
1. Does the owner or operator maintain an operating record as required in 265.73?	X			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c. The location and quantity of each hazardous waste within the facility?	X			2 areas
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				N.A.
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			If applicable
f. Reports detailing all incidents that required implementation of the Contingency Plan?			X	N.A.
g. All closure and post closure costs as applicable?			X	Note closure section.

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI	Remarks
(A) Closure				
1. Is the facility closure plan available for inspection?		X		Dames and Moore Final plan due Aug. 1, 1981
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?			X	N.A.
4. Is the written closure cost estimate available?		X		due Aug. 1, 1981 - Prelim. plan complete but not available.
(B) Post closure care and use of property				
1. Is the facility post-closure plan available for inspection?				N.A.
2. Has this plan been submitted to the Regional Administrator?				N.A.
3. Has the post-closure period begun?				N.A.
4. Is the written post-closure cost estimate available?				N.A.

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANGEMENT OF CONTAINERS

Facility Name: U.S. Steel Corp.-Cuyahoga Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
1. Are containers in good condition?	X			No leaks/ruptures
2. Are containers compatible with waste in them?	X			D008 - Pb only.
3. Are containers managed to prevent leaks?	X			On pallets.
4. Are containers inspected weekly for leaks and defects?	X			Inspection log

	Yes	No	NI	Remarks
5. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	—	—	X	N.A.
6. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	X	N.A.
7. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	—	—	X	N.A.

J
TANKS

Facility Name: U.S. Steel Corp-Cuyahoga Date of Inspection: 7-24-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X	—	—	See remarks
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	—	—	X	Covered
3. Do continuous feed systems have a waste-feed cutoff?	—	X	—	See remarks
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	—	—	X	N.A.
5. Are required daily and weekly inspections done?	X	—	—	Pipe stop log
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	—	—	X	N.A. K062 & D008 only

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) ___ ___ X N.A.

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 40,000 gallons for 4 separate tanks (connected).

~~Tank diameter: _____ feet~~

Distance of tank from property line > 50 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K

SURFACE IMPOUNDMENTS

Facility Name: U.S. Steel - Cuyahoga Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	___	___	___	N.A.
2. Do earthen dikes have protective covers?	___	___	___	N.A.
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	___	___	___	N.A.
4. Is the freeboard level inspected at least daily?	___	___	___	N.A.
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	___	___	___	N.A.
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	N.A.

	Yes	No	NI	Remarks
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	N.A.

L

WASTE PILES

Facility Name: U.S. Steel Corp.-Cuyahoga Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind?	___	___	___	N.A.
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	___	___	___	N.A.
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? (The effective date of this provision is Nov. 19, 1981.)	___	___	___	N.A.
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	N.A.
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	N.A.
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	N.A.
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	N.A.

*Not Inspected

LAND TREATMENT

Facility Name: U.S. Steel - Cuyahoga Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation?	___	___	___	N.A.
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	___	___	___	N.A.
3. Is waste analyzed according to 265.273?	___	___	___	N.A.
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	N.A.
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	___	___	___	N.A.
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	N.A.
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	___	___	___	N.A.
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	___	___	___	N.A.
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)	___	___	___	N.A.

LANDFILLS

Facility Name: U.S. Steel-Cuyahoga Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	N.A.
**2. Collection of run-off from active portions of the fill?	___	___	___	N.A.
**3. Is collected run off treated?	___	___	___	N.A.
4. Control of wind dispersal of hazardous waste?	___	___	___	N.A.
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	N.A.
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	N.A.
(C) Closure and Post-Closure				
1. Is the Closure Plan available?	___	___	___	N.A.
2. Has this plan been submitted to the Regional Administrator?	___	___	___	N.A
3. Has closure begun?	___	___	___	N.A.
4. Is the closure cost estimate available?	___	___	___	N.A.
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.)	___	___	___	N.A.

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

	Yes	No	NI	Remarks
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	N.A.
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	N.A.
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	N.A.
3. Does the landfill have a functional leachate collection system?	___	___	___	N.A.
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	N.A.
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	N.A.

(A) Facility Name: U.S. Steel Corp. - Cuyatoga Plant

(B) Date of Inspection: 7-24-81

I. Determination of Steady State

(A) Type of unit (i.e., type of incinerator or thermal treatment): _____

No incineration or thermal treatment

(B) Components and steady state condition:

Was each component at steady state prior to adding waste?

	Component	Yes	No	NI	Remarks
1.		___	___	___	N.A.
2.		___	___	___	"
3.		___	___	___	"
4.		___	___	___	"
5.		___	___	___	"

II. Waste Analysis

(A) Minimuim requirements, for wastes not prviously burned/treated.

	Yes	No	NI	Remarks
1. Required analyses; has an analysis been performed for the following?				
a. Heating value	___	___	___	N.A.
b. Halogen content	___	___	___	"
c. Sulfur content	___	___	___	"

	Yes	No	NI	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	N.A.
b. Mercury:	___	___	___	"

(B) List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	N.A
2.	_____	"
3.	_____	"
4.	_____	"
5.	_____	"

III. Monitoring and Inspections

	Yes	No	NI	Remarks
(A) Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	N.A.
(B) Is steady stte maintained or corrections attempted?	___	___	___	"
(C) Is stack plume observed at least hourly for normal color and opacity?	___	___	___	"
(D) Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	"
(E) If yes to D above, were corrections made to return emissions to normal apperance?**	___	___	___	"
(F) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	"

**Specify in Remarks for what period of time this was checked.

	Yes	No	NI	Remarks
(G) Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	N.A.

IV. Open Burning

(A) Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	N.A.
2. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	"

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: U.S. Steel Corp. - Cuyahoga Plant

Date of Inspection: 7-24-81

	Yes	No	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	N.A.
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	"
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	"
4. Are inspection procedures followed according to 265.403?	___	___	___	"
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	"
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	"

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

		Yes	No	NI	Remarks
(A)	Does the operator have copies of the manifest available for review?	X			Available at facility.
(B)	Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
	1. Manifest document number?	X			Start w/ 0001
	2. Name, mailing address, telephone number, and EPA ID number of Generator	X			Typed-in
	3. Name and EPA ID Number of Transporter(s)?	X			
	4. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X			Easterly WWTP OH 0624643
	5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			On all manifests reviewed.
	6. The total quantity of waste(s) and the type and number of containers loaded?			X	No containers shipped
	7. Required certification?	X			
	8. Required signatures?	X			
(C)	Did the generator receive a signed copy of each manifest from the designated facility within 35 days?	X			Haz. Wst. Manifest log

	Yes	No	NI	Remarks
1. If not, was an Exception Report submitted to the Regional Administrator?			X	N.A. to date.
2. Was the Exception Report submitted within 45 days of the date of the waste was accepted by the initial transporter?			X	N.A. " "
(D) If an Exception Report was submitted, did it contain the following information:				
1. A legible copy of the manifest for which the generator does not have confirmation of delivery?			X	N.A. " "
2. A cover letter is signed by the generator or his representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?			X	N.A. " "
(E) How many manifests were checked during the inspection?				351 checked on-log, reviewed individual manifests.
(F) Describe the generators system for tracking manifests:				Shipping dept. initiates manifest, guards O.K. at gate, copy sent to Lorain accounting and R. Stinson for hard-logging, logs checked routinely to initiate exception reports at 35 and 45 days if necessary.

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)			X	No pickup during inspection.
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)			X	
(C) If required, are placards available to transporters of hazardous waste?			X	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

		Yes	No	NI	Remarks
1.	Are containers marked with start of accumulation date?	___	___	___	N.A.
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	"
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections ignitable or reactive waste located at least 15 meters (50 feet) from facility's property line?	___	___	___	"
4.	If waste are stored in tanks, are the tanks managed according to the following requirements?				
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	"
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	"
	c. Do continous feed systems have a waste-feed cutoff?	___	___	___	"
	d. Are required daily and weekly inspections done?	___	___	___	"
	e. Are reactive & ignitable wastes in tankks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	"
	f. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)	___	___	___	"

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			If applicable
(B) Has the generator submitted Annual Reports and Exception Reports as required?			X	N.A. to date

VIII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI	Remarks
Has the installation imported or exported Hazardous Waste?		X		N.A. to date

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste; has a generator:
   - a. Notified the Administrator in writing? — N.A.
   - b. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country? — N.A.
   - c. Met the Manifest requirements? — N.A.
2. Importing Hazardous Waste; has the generator met the manifest requirements? — N.A.

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM and RECORDKEEPING
(Subpart B)

	Yes	No	NI	Remarks
Are copies of the completed manifests of shipping paper(s) available for review and retained for three years?	___	___	___	N.A.

II. INTERNATIONAL SHIPMENTS

	Yes	No	NI	Remarks
(A) Does the tranporter record on the manifest the date the waste left the U.S.?	___	___	___	"
(B) Are signed completed manifest(s) on file?	___	___	___	"

V. MISCELLANEOUS

	Yes	No	NI	Remarks
(A) Does transporter trnsport hazardous waste into the U.S. from abroad?	___	___	___	"
(B) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	"

NOTE: If (A) or (B) were answered "Yes" then the transporter is also a Generator and must comply with the Generator regulations.

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

1. D008 Pb haz. waste stored in fenced area south of plant. Waste sludge from old molten Pb dip tank on heat treating line. No longer used. Area posted. No longer produced.
2. K062 spent pickling liquor in 4- 40,000 gallon tanks (covered). Float gauges on all four tanks. Volume checked by pipefitters 3x/day and prior to receipt of additional waste. Tank mtl. is steel shell, rubber and brick lining.
3. Contingency Plan not sent to State and local authorities.
4. Non-hazardous solid waste disposal site located south of plant.

OhioEPA

Re: Application Number 81-HW-0091
Cuyahoga County

August 26, 1981

Karl Kummant, Chief Engineer
U.S. Steel Corporation, Cuyahoga
1807 E. 28th Street
Cuyahoga Heights, Ohio 44125

Dear Mr. Kummant:

On July 24, 1981, Charles Grigalauski of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Russell Stilson.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Charles Grigalauski, U.S. EPA, Region V
NEDO

CERTIFIED MAIL

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 0510250 1
(11) (18)

Fayette CO. - L.P.C. Region # 5 Date 06/30/81
(20) (25)

St. Elmo / Natural Gas Pipeline
(Location) (Responsible Party)

Letter Sent (Yes or No) No (26)

Samples Taken: Yes ( ) No (X) Time: From __:__ am
Ground Water( ) Surface( ) Other( ) To 11:00 am
Photos Taken: Yes ( ) No (X) Interviewed E.E. Lindsey, William George, Virginia Cleary

Weather overcast, ~40°

Inspector J M S
(27) (29)

Previous Inspection none Previous Correspondence none Site Open: Yes(X) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	(X)	Landfill	( )	Storage	( )	E.P.A. Permit	( ) NA
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other ____	(X)	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		1 (30)		Board Order	( )
						Illegal (5)	( ) (31)

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D S (62)

GENERAL REMARKS: This gas storage facility notified U.S. EPA as a hazardous waste generator for ignitable and toxic wastes. No hazardous waste was present or had been generated at the time of the inspection - I was told the notification was for "insurance."

This site operates a class I underground injection well for wastewater from re-purification of gas. After looking at several waste water analysis reports (see attached copies) it does not appear that the waste water is hazardous. The I-EPA Hydrogeology unit, which handles the UIC program arrived at the same conclusion.

INTERVIEW:

DIAGRAM:

STATE IDENTIFICATION NUMBER
(If Applicable)

ILD077099719
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: NATURAL GAS PIPELINE CO. OF AMERICA

(B) Street: P.O. BOX 187

(C) City: ST. ELMO (D) State: ILLINOIS (E) Zip Code: 62458

(F) Phone: 618-829-3224 (G) County: FAYETTE

(H) Date of Inspection: 5/6/81 Time of Inspection (From) 10:00 am (To) 11:00 a

(I) Weather Conditions: Overcast, 40's

(J) Person(s) interviewed	Title	Telephone
E.E. Lindsey	Superintendent	618-829-3224
William George	Supervisory Engineer	618-829-3224
Virginia Cleary	Associate Engineer	312-431-7522

(K) Inspection Participants	Agency/Title	Telephone
Jeff Stern	Illinois EPA EPS-I	217-782-676

(L) Preparer Information

Name	Agency/Title	Telephone
Jeff Stern	Illinois EPA/EPS-I	217-782-6760

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Rev. 1-27-81/J.B.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Gas storage facility notified as generator of hazardous wastes (toxic, ignitable) but no haz. waste was being generated at the time of the inspection.

III. MANIFEST REQUIREMENTS
(Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	___	_____
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	___	___	___	_____
2. Name, mailing address, telephone number, and EPA ID number of generator?	___	___	___	_____
3. Name and EPA ID Number of transporter(s)?	___	___	___	_____
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	___	___	___	_____

*Not Inspected

N..URAL GAS PIPELINE COMPANY OF AMERICA
JOLIET LABORATORY

LK
FPH
DBS
EEL
JMK ✓
STA.206
DCK

INJECTION WASTE WATER ANALYSIS REPORT

SAMPLE SOURCE: STATION 206

LABORATORY NUMBER: PAR 81-41

DATE SAMPLED:	03/03/81
DATE RECEIVED:	03/05/81
DATE COMPLETED:	03/13/81
DATE REPORTED:	03/17/81

ACIDITY:	
FREE MINERAL ACIDITY (MG/L AS CACO3)	0
TOTAL (MG/L AS CACO3)	0
ALKALINITY:	
BICARBONATE (MG/L AS NAHCO3)	0
CARBONATE (MG/L AS NA2CO3)	1218
PHENOLPHTHALEIN (MG/L AS CACO3)	3475
TOTAL (MG/L AS CACO3)	4050
ANTHRAQUINONE DISULFONIC ACID (MG/L AS ADA)	1
CITRATE (MG/L AS NA3C6H5O7)	0
CHLORIDE (MG/L AS CL)	51300.
CHROMIUM (MG/L AS CR)	.2
FLUORIDE (MG/L AS F)	.1
HARDNESS:	
CALCIUM (MG/L AS CA)	2720
MAGNESIUM (MG/L AS MG)	1015
TOTAL (MG/L AS CACO3)	10972
TOTAL IRON (MG/L AS FE)	5.8
PH	9.4
TOTAL PHOSPHATE (MG/L AS PO4)	.8
SILICA (MG/L AS SIO2)	16
SODIUM (MG/L AS NA)	22700
SOLIDS:	
TOTAL DISSOLVED (MG/L)	99445.
NON-FILTERABLE (MG/L):	
TOTAL @ 105 DEGREES C	329
VOLATILE @ 550 DEGREES C	108
SPECIFIC GRAVITY @ 25 DEGREES C	1.054
SULFATE (MG/L AS SO4)	353
(MG/L AS NA2SO4)	526
TARTRATE (MG/L AS NAKC4H4O6)	
THIOSULFATE* (MG/L AS NA2S2O3)	INTERFERENCE
TURBIDITY (NTU)	2.4
VANADIUM (MG/L AS V)	12

* IODOMETRICALLY TITRATED AND CALCULATED AS NA2S2O3.

ANALYST(S): DTS

CHECKED BY:

APPROVED BY:

RCRA Inspection Report

EPA Identification Number OH D004220810

HWFAB Permit Number (if appropriate) 02-18-0091

Facility Name U.S. Steel Corp. Cuyahoga Wks.

Location 4300 E. 49th St

Cuyahoga Hts, Ohio 44125

Person(s) Interviewed	Title	Telephone
Mike Schack	Environmental Eng.	(216) 277-2482
John Garvey	Maintenance Eng.	(216) 341-5000

Inspector(s)	Agency/Title	Telephone
Steve Tuckerman	Ohio EPA Env. Sci.	(216) 425-9171
	Ohio EPA	
	Ohio EPA	

Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☒ Financial Requirements
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004220810

Facility: US Steel Corp. Cuyahoga Address: 4300 E 49th St City: Cuyahoga Hts

State: Ohio Zip Code: 44125 County: Cuyahoga Telephone: (216) 341-5000

Facility Operator: J. R. Ferguson (US Steel) Title: Senior V.P. Telephone: (412) 433-6012

Facility Owner: U.S. Steel Corporation Address: 600 Grant St

City: Pittsburgh State: Pa Zip Code: 15230 Telephone: (412) 433-6012

Type of Ownership: X Private ____ Government State HWFAB No. 02-16-0091

Date of Inspection: 6-8-82 Time of Inspection: (Start) 09:00 (Finish) 11:00

Advance Notification? ___ No X Yes:

Weather Conditions: Partly Sunny - Warm

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Mike Schack	Env. Engr.	(216) 277-2482
2.	John Geervey	Maint. Engr	(216) 341-5000
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Steve Tuckerman	Environmental Scientist	(216) 425-9171
2.		Ohio EPA	
3.			
4.			

1. Type(s) of hazardous waste site activity: A. X Generation B. X Storage C. ____ Treatment
   D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

   a) Listed Wastes: K062

   b) Non-Listed Wastes: ____ I (D001) ____ C (D002) ____ R (D003) X K E (D000)

   D008 see remark #1.1

3. Has this facility submitted a Part A Permit Application? X Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

   ____ Yes, See Remark # ____ X No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) Applicable U.S. EPA I.D. Number NA

b) Ohio P.U.C.O. GR TRSF Number NA

7. A brief description of site activity:

The Cuyahoga works manufactures steel wire & rod & flat strip steel. HW activity includes storage of K062 & D008

REMARKS, PART 1. (GENERAL INFORMATION)

1.1 D008 is a dust containing 10% Pb. The dust came from an old heat treat line where Pb was used to quench the steel. Fumes & fugitive dust from the line collected inside the plant. When the area was cleaned, the dust was drummed & found to be EP toxic. When "conditions are better", the dust will be disposed. (This line is no longer in production & was closed prior to RCRA.)

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	X			2.1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	X			2.2
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	X			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	X			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	X			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	X			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	X			

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	X			2.1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	X			2.2
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	X			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	X			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	X			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	X			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	X			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	X			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	X			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	X			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	X			
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	X			
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	X			
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			X	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			X	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.			X	
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).				
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.				
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.				
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).				
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).				
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).				
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	X			
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	X			

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			X	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

2.1 Zinc dross from the hot dip zinc line is used to recover heavy metals.

2.2 Rinse waters from pickling operations are treated under an NPDES permit. Solids settled in lagoon as part of treatment system. No testing of lagoon sludge to determine hazard, if any.

PART 3. TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).			X	
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.				
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.				
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).				
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).				
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.				
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).				
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?				
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).			N/A	

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?			X	
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?				
9. Does the transporter store hazardous wastes temporarily while they are in transit?				
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)				

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?				
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?			✓	

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	X			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	X			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	X			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	X			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	X			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	X			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	X			
a) Inspect emergency equipment.	X			
b) Inspect monitoring equipment.			X	
c) Inspect security, alarm and communications devices.	X			
d) Inspect process equipment (pipes, pumps, etc.).	X			
e) Inspect containment structures (dikes, curbs, etc.).			X	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	X			
g) Inspect hazardous waste handling/loading areas each day used.	X			
h) Record of any malfunctions due to equipment or operator errors.			X	
i) Record of any hazardous waste discharges.			X	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	X			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).			X	

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.			X	
b) Physical separation of incompatible waste materials.	X			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			X	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			X	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		X		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	X			
a) Internal alarm system	X			
b) Access to telephone, radio or other device for summoning emergency assistance.	X			
c) Portable fire control equipment.			X	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.			X	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	X			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	X			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			X	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	X			
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.	X			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	X			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).			X	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	X			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	X			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			X	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	X			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	X			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	X			
c) The estimated (or actual) weight, volume or density of the waste material(s).	X			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	X			

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	X			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	X			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	X			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	X			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	X			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	X			

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			X	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).			X	
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).			X	
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.			X	
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.			X	

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.			X	

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	—	—	X	—
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	—	—	X	—

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	X	—	—	—
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	X	—	—	—
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	X	—	—	—
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	X	—	—	—
d) A description of steps taken to decontaminate facility equipment.	X	—	—	—
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	X	—	—	—
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	—	—	X	—

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			X	
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			X	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.				
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).				
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).				

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.			X	
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.				
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.				
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.				

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.			X	

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	X			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	X			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	X			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).			X	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			X	

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	X			

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.			X	5.1
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			X	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	X			
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	X			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).			X	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.				
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.				

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).			X	
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.				
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.				
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).				
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).				
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).				

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).			X	
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).			X	

Significant Changes from 1985 Submittal

1. A factor of 1.0333 was utilized to adjust for inflation.

2. The following facility was deleted from the list of facilities submitted in 1985:

   EPA I.D. No. TXD 007331002, Oilwell Division - Garland Works, 4040 Forest Lane, Garland, TX 75040. This facility has been closed.

3. The closure/post-closure cost estimates for the following facilities increased or decreased as a result of closure/post-closure plan revisions:

   (a) EPA I.D. No. ALD 002904506, Fairfield Works, 6200 Flint Ridge Road, Fairfield, AL 35064.

   (b) EPA I.D. No. IND 005444062, Gary and Tubing Specialties, One North Broadway, Gary, IN 46401.

   (c) EPA I.D. No. KYD 092825538, USS Chemicals, 7350 Empire Drive, Florence, KY 41042.

   (d) EPA I.D. No. OHD 005108477, USS Chemicals, P. O. Box 127, Irontown, OH 45638.

   (e) EPA I.D. No. TXD 047467113, Texas Works, P. O. Box 29, Baytown, TX 77520.

   (f) EPA I.D. No. UTD 009086133, Geneva Works, P. O. Box 510, Provo UT 84601.

4. U. S. Steel is again including closure and post-closure estimates for Imperial West Chemical Co. in Pittsburg, California as part of this demonstration of financial responsibility. U. S. Steel is the owner of the property on which the Imperial West facilities are located. By including the Imperial West facilities, U. S. Steel is not admitting that Imperial West operates hazardous waste facilities on the U. S. Steel property.

5. U. S. Steel has satisfied Pennsylvania bonding and insurance requirements for the following two facilities:

   (a) EPA I.D. No. PAD 002375376, Fairless Works, Fairless Hills, PA 19030.

   (b) EPA I.D. No. PAD 00739672, Taylor Landfill, Delwar Road, West Mifflin, PA 15122.

Although not specifically required by regulation to do so, USSC is including the closure/post-closure care cost estimates for these two facilities in the total of all estimates under Part B-Alternative II, Numbers 1 and 3.